



December 21, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On October 8, 2015, the FCC Wireline Competition Bureau (WCM) released A-CAM Report Version 3.0 and its illustrative results for rate-of-return carriers by Public Notice DA 15-1154. That report showed Alma Telephone Company (ATC or Alma) has 8,801 locations within its service territory, but 2,937 locations eligible for model-based support.

After further analysis, Vantage Point Solutions has determined that some of ATC's own coaxial-based service offerings are inappropriately being characterized by the model as unsubsidized competitors and are therefore knocking census blocks out of model-based funding. Vantage Point hereby respectfully requests the WCB correct this inaccuracy.

BACKGROUND

ATC is an ILEC headquartered in Alma, GA serving 4,488 rural customers in southeast Georgia. ATC utilizes a variety of technologies, including those utilizing coaxial cable and fiber, to serve the 2,383 census blocks within its study area (SAC 220344). ATC itself owns and operates the network utilized within that study area (Attachment A). Additionally, an affiliate ATC Broadband LLC, owns and operates a coaxial cable network in and around the communities of Patterson and Offerman, GA (Attachment B).

UNSUBSIDIZED COMPETITORS

Attachments A and B show geographically where, according to recently-released 477 data, ATC's cable served census blocks are being removed as unsubsidized competitors offer qualifying

service. The A-CAM shows that 376 census blocks are removed from support due to an unsubsidized cable competitor. According to the 477 data, ATC is the only coaxial-based CATV provider serving that area. As such, it is clear that Alma's own facilities are knocking census blocks out of model-based funding.

LOOKING FORWARD

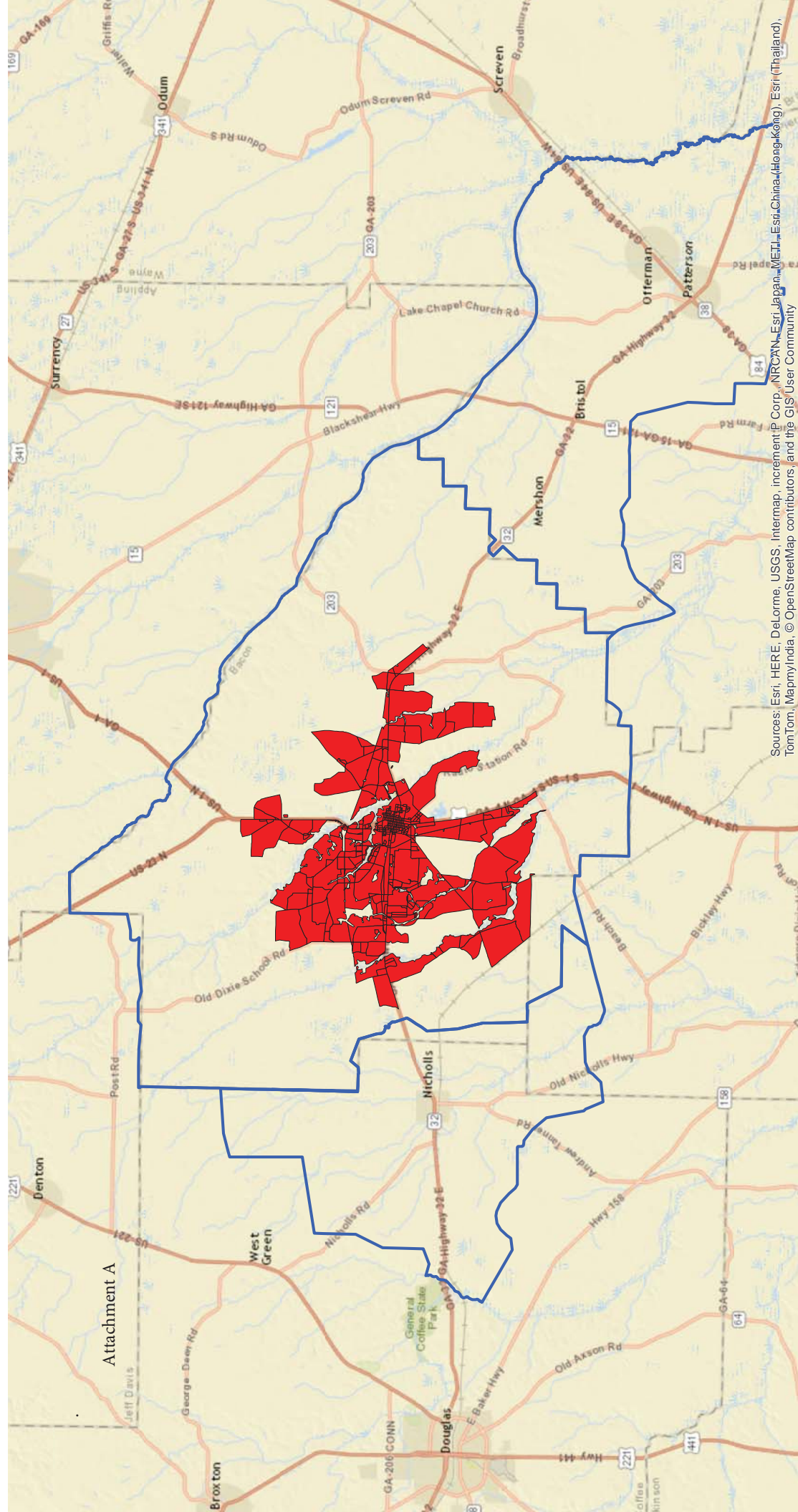
The inaccurate characterization of 376 census blocks as being served by an unsubsidized competitor reduces the amount of ATC's model based support. Although significant additional funding will likely not be available to companies with high rates of 10/1 deployment, Alma Telephone Company would likely embrace the new regulatory framework of model-based funding.

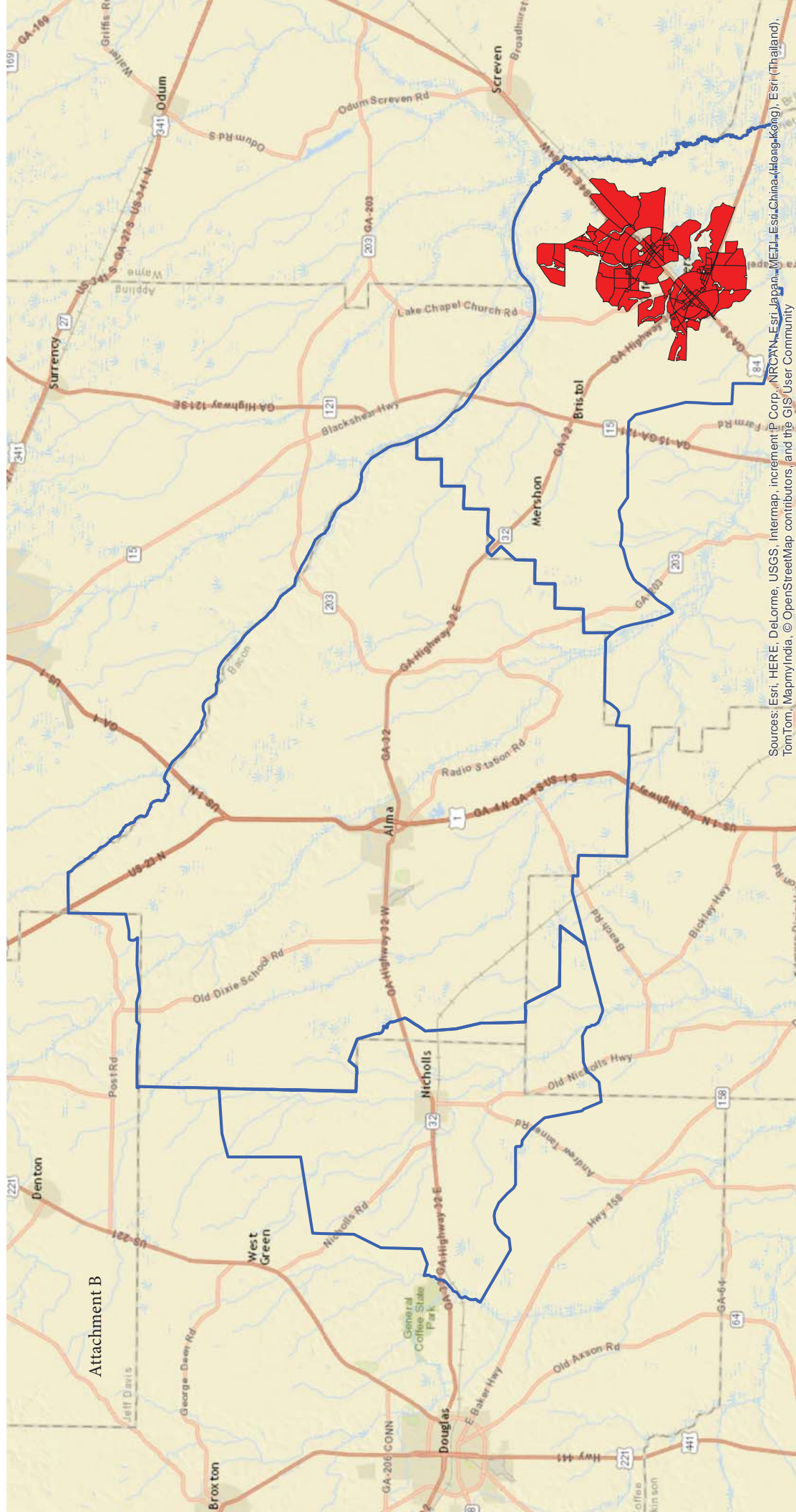
Vantage Point Solutions understands model report 4.0, released late last week, addressed this issue. We respectfully request the WCB continue to use the report 4.0 approach for Alma Telephone Company and for other, similarly-situated rural providers. If any additional information on this matter can be helpful to the FCC, please let us know.

Sincerely,

A handwritten signature in black ink that reads "Dustin Johnson". The signature is written in a cursive, flowing style.

Dustin "Dusty" Johnson
Vice President of Consulting





Attachment B

Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, VEI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community